

STATE OF MINNESOTA  
HENNEPIN COUNTY

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

State of Minnesota

Plaintiff,

The Honorable Peter A. Cahill

vs.

Derek Michael Chauvin

Dist. Ct. File 27-CR-20-12646

Defendant

**NOTICE OF MOTION AND MOTION  
OF MEDIA COALITION TO UNSEAL  
JUROR IDENTITIES AND OTHER  
JUROR MATERIALS**

TO: The Honorable Peter A. Cahill, Fourth Judicial District Court Judge; Matthew Frank, Assistant Attorney General, attorney for State of Minnesota; Eric Nelson, attorney for Derek Chauvin.

American Public Media Group (which owns Minnesota Public Radio); The Associated Press; Cable News Network, Inc.; CBS Broadcasting Inc. (on behalf of WCCO-TV and CBS News); Court TV Media LLC; Dow Jones & Company (which publishes *The Wall Street Journal*); Fox/UTV Holdings, LLC (which owns KSMP-TV); Gannett Satellite Information Network, LLC (which publishes *USA Today*); Hubbard Broadcasting, Inc. (on behalf of its broadcast stations, KSTP-TV, WDIO-DT, KAAL, KOB, WNYT, WHEC-TV, and WTOP-FM); Minnesota Coalition on Government Information; NBCUniversal Media, LLC; The New York Times Company; The Silha Center for the Study of Media Ethics and Law; Star Tribune Media Company, LLC; TEGNA Inc. (which owns KARE-TV); and WP Company LLC (which publishes *The Washington Post*) (collectively, the “Media Coalition”) make the following motion seeking to unseal juror identities and other juror information, including the prospective juror list,

juror profiles, juror questionnaires and the original verdict forms. This motion is based upon a contemporaneously filed memorandum, and all the files, records, and proceedings herein.

This motion will be heard at a time and date that is mutually agreeable to the Media Coalition and the parties before the Honorable Peter A. Cahill, Judge, Fourth Judicial District Court Judge. The undersigned has asked counsel for the parties advise whether they oppose this Motion and they have not yet responded.

Dated: August 4, 2021

**BALLARD SPAHR LLP**

*s/ Leita Walker*

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***Attorneys for Media Coalition***